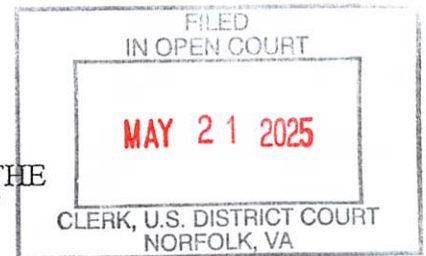


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Norfolk Division



UNITED STATES OF AMERICA

v.

SHANE MATTHEW HARLACHER,

Defendant.

UNDER SEAL

CRIMINAL NO. 2:25-CR-63

18 U.S.C. § 2251(a)

Production of Child Sexual Abuse Material
(Counts 1 and 2)

18 U.S.C. § 2252(a)(1)

Transportation of Child Sexual Abuse
Material
(Count 3)

18 U.S.C. § 2252(a)(4)(A) and (b)(2)

Possession of Child Sexual Abuse Material
(Count 4)

Criminal Forfeiture

INDICTMENT

May 2025 Term—at Norfolk, Virginia

COUNT ONE

(Production of Child Sexual Abuse Material)

THE GRAND JURY CHARGES THAT:

On or about October 31, 2021, in the City of Virginia Beach, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, SHANE MATTHEW HARLACHER, attempted to and did employ, use, persuade, induce, entice, and coerce a minor, Jane Doe, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that

such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that such visual depiction had actually been transported and transmitted using a means and facility of interstate commerce and in and affecting interstate and foreign commerce.

(All in violation of Title 18, United States Code, Section 2251(a).)

COUNT TWO

(Production of Child Sexual Abuse Material)

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 14, 2021, in the City of Virginia Beach, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, SHANE MATTHEW HARLACHER, attempted to and did employ, use, persuade, induce, entice, and coerce a minor, Jane Doe, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using a means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and that such visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and that such visual depiction had actually been transported and transmitted using a means and facility of interstate commerce and in and affecting interstate and foreign commerce.

(All in violation of Title 18, United States Code, Section 2251(a).)

COUNT THREE
(Transportation of Child Sexual Abuse Material)

THE GRAND JURY FURTHER CHARGES THAT:

In and around December 2021, January 2022 and February 2022, in the Eastern District of Virginia and elsewhere, the defendant, SHANE MATTHEW HARLACHER, did knowingly transport and ship a visual depiction using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, to wit: digital videos and images depicting minors engaged in sexually explicit conduct located on a 1TB silver flash drive, an example being a file with filename VIDEO0061-0.mpg.

(All in violation of Title 18, United States Code, Section 2252(a)(1).)

COUNT FOUR
(Possession of Material Involving the Sexual Exploitation of Minors)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2024, in the special maritime and territorial jurisdiction of the United States, to wit, aboard the USS Mount Whitney, the defendant, SHANE MATTHEW HARLACHER, whose last known residence in the United States was in the City of Virginia Beach, Virginia, in the Eastern District of Virginia, knowingly possessed matter containing a visual depiction, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, and at least one visual depiction depicted a prepubescent minor and a minor who had not attained 12 years of age, to wit: digital videos and images depicting minors engaged in sexually explicit conduct and located on an

Apple iPhone 13 mini and all storage materials contained therein, an example being a file with filename d28.mp4.

(All in violation of Title 18, United States Code, Sections 2252(a)(4)(A) and (b)(2).)

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

The defendant, SHANE MATTHEW HARLACHER, is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction of any count of the Indictment, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 2253: (1) any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, and any matter that contains any such visual depiction, which was produced, transported, mailed, shipped, and received in violation of this chapter; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense, and any property traceable to such property.

The property subject to forfeiture includes, but is not limited to, the following:

1. Apple iPhone with case
2. Black Apple iPhone with black case
3. Asus Laptop with charging cable serial number E4NOCXOZ7571147
4. Toshiba Disk Drive serial number 40OAFFMQS
5. One Western Digital Disk Driver serial number WMASY2746504
6. Black MSI Laptop with charger serial number KZ1O7N0105384
7. 1 TB Flash Drive Silver in color
8. One micro-SD USB 2.0 with SD card with 2 additional Micro SD cards

If any property subject to forfeiture is unavailable, the United States may seek an order forfeiting substitute assets pursuant to Title 21, U.S. Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(All in accordance with Title 18, United States Code, Section 2253; Title 21 U.S. Code, Section 853(p); and Fed. R. Crim. P. 32.2(a) & 32.2(e).)

United States of America v. SHANE MATTHEW HARLACHER
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Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.

A TRUE BILL:

REDACTED COPY

FOREPERSON

Erik S. Siebert
United States Attorney

By:



E. Rebecca Gantt
Assistant United States Attorney
United States Attorney's Office
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Norfolk, VA 23510